



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

January 31, 2024

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VIA ELECTRONIC FILING

Honorable William C. Griesbach
U.S. District Court Eastern District
Green Bay Division
125 S. Jefferson Street
Green Bay, WI 54301

Re: William Robert Shaw v. Randy Piontkowski
Eastern District Case No. 1:20-cv-01544-WCG

Dear Judge Griesbach:

I have had the opportunity to speak at length with Mr. Shaw, who asks that I alert the Court to several matters that will present on the morning of trial.

Mr. Shaw intends to request the Court to sequester witnesses under Fed. R. Evid. 615.

In addition, he intends to file several motions on the morning of trial due to logistical issues at the jail and his lack of funds.

These include a motion for clarification of an earlier motion in limine that he filed. He wishes to ensure that Defendants he originally sued but who have now been dismissed from this litigation are bound by their answers to request to admit served upon them under Rule 36 if they testify in this case.

He also intends to request the Court for clarification on the issues to be tried in this case, particularly on the reasonableness of Ofc. Piontkowski's investigatory stop and his ultimate treatment of the Plaintiff.

Next, he will move to strike the Defendant's summary judgment motions and seek reinstatement of those Defendants previously dismissed.

He indicates that he will provide additional information about the witnesses that he listed in his pretrial report and the reasons why the testimony of those witnesses is required to prove his case, beyond the information he has already provided orally at the pretrial conference.

Lastly, he is concerned that, with the trial scheduled for two days, he will be allocated adequate time to present his case.

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I will continue to provide Mr. Shaw my advice on these and other subjects as standby counsel, but given the matters he has outlined, the Court may consider a delay in impaneling the jury if it intends to take up these issues at the beginning of trial.

Thank you very much.

Very truly yours,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: *Electronically signed by George Burnett*
George Burnett

GB/jf

4896594

cc: William R. Shaw - *via e-mail and USPS*